

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

S.T.,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE
)	NO. 4:24-CV-00225-WMR
CARSON LOOP ESM, LLC d/b/a)	
BUDGETEL, and SRINIVAS)	
BOLLEPALLI,)	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR LEAVE TO AMEND THE COMPLAINT

COMES NOW Plaintiff and hereby moves for leave to amend her Complaint under Federal Rule of Civil Procedure 15(a)(2), as follows:

Plaintiff respectfully requests leave to amend her Complaint under Rule 15(a)(2), for the sole purpose of revising the dates of her trafficking at the subject Budgetel. Along with this Motion, Plaintiff submits her Memorandum in Support of the Motion for Leave to Amend the Complaint and a Proposed Amended Complaint for the Court's review.

This 24th day of June, 2025.

Respectfully submitted,

LAW & MORAN

/s/ Denise D. Hoying

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CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing *Plaintiff's Motion for Leave to Amend the Complaint* has been prepared with one of the following font and point selections approved by the Court in L.R. 5.1. Specifically, the above mentioned pleading was prepared using Times New Roman font of 14 point size.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that I have this day served a true and correct copy of the foregoing *Plaintiff's Motion for Leave to Amend the Complaint* with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to:

Sean W. Martin
Stephen A. Swanson
Carr Allison
633 Chestnut St.
Suite 2000
Chattanooga, TN 36450

This 24th day of June, 2025.

Respectfully submitted,

LAW & MORAN

/s/ Denise D. Hoying

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